

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA : No. 19-CR-10075-MLW

VS. :

RUDOLPH MEREDITH : MARCH 5, 2020

MOTION TO MODIFY CONDITIONS OF RELEASE

Rudolph Meredith, defendant in the above-captioned case, hereby moves to modify the conditions of his release set forth in this Court’s Order Setting Conditions of Release dated and filed March 28, 2019. Specifically, he moves for judicial permission to change his residence from Connecticut to Florida so he can accept an offer of employment with a Florida construction company. In support of this motion he states:

- 1. On March 28, 2019 he appeared before the Court, waived indictment and pled guilty to an information that charged him with conspiracy to commit honest services wire fraud and honest services wire fraud. On that same date the Court entered an Order Setting Conditions of Release that, inter alia, ordered Mr. Meredith to “advise the court or the pretrial services office or the supervising officer in writing before making any change of residence” and to “[m]aintain residence and do not move without prior permission.”**
- 2. Mr. Meredith has been offered employment by a Florida construction company and seeks to relocate to Florida, where he would reside in an apartment at a home**

that he owns and rents. He has disclosed to his pretrial services officer the specifics of this proposal and was advised that he needs to obtain approval from the Court before it can obtain courtesy supervision of Mr. Meredith in Florida.

3. Mr. Meredith has also disclosed the details of the proposed relocation and employment to the Assistant U.S. Attorney in this case and he has no objection to them.
4. Mr. Meredith is awaiting sentencing but no sentencing date has been set.

WHEREFORE, the defendant Rudolph Meredith moves this Court to modify the Order Setting Conditions of Release to the limited extent of authorizing him to change his address to the location and for the purpose described above.

RESPECTFULLY SUBMITTED

DEFENDANT, RUDOLPH MEREDITH

By: /s/Felice M. Duffy

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CERTIFICATION

THIS IS TO CERTIFY that on March 5, 2020, a copy of the foregoing was filed electronically [and served by mail on anyone unable to accept electronic filing]. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Felice M. Duffy

Felice M. Duffy